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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**TIMOTHY WILSON,**

**Defendant.**

**CASE NO. 2:20-CR-00129-JAD-EJY**

**STIPULATION FOR A  
PROTECTIVE ORDER**

The parties, by and through the undersigned, respectfully request that the Court issue an order protecting from disclosure to the public, or any third party not directly related to this case, any documents, recordings, or other tangible things produced by the government during discovery that contain the confidential taxpayer information or personal identifying information of individuals referenced in the discovery. The parties state as follows:

1. The indictment in this case issued on June 17, 2020.
2. Trial is currently scheduled for August 25, 2020. Mr. Chris T. Rasmussen, Esq. is

1 retained counsel for the defendant.

2           3.       The indictment alleges the defendant willfully failed to pay over employment taxes  
3 arising out of his dental practice and that he also willfully failed to pay his own income taxes and  
4 to file individual income tax returns. The discovery therefore contains extensive amounts of  
5 taxpayer information, including tax returns and information otherwise deemed confidential  
6 under 26 U.S.C. § 6103. The discovery also contains the personal identifying information, such  
7 as names, social security numbers, and birthdates of numerous individuals. The release of such  
8 information to the public or third parties not involved in the case could endanger the privacy of  
9 the defendant and individuals mentioned in the discovery and also subject them to potential  
10 misuse of their identities. This confidential taxpayer and personal identifying information is  
11 referred to here as the “Protected Information.”

12           4.       In order to protect the privacy of the individuals referenced in the discovery, the  
13 parties intend to restrict access to the following individuals: attorneys for all parties, and any  
14 personnel that the attorneys for all parties consider necessary to assist in performing that  
15 attorney’s duties in the prosecution or defense of this case, including investigators, paralegals,  
16 retained experts, support staff, interpreters, and any other individuals specifically authorized by  
17 the Court (collectively, the “Covered Individuals”).

18           5.       The Covered Individuals shall be advised of the Protective Order, and, without  
19 leave of Court, the Covered Individuals shall not:

- 20           a.       make copies for, or allow copies of any kind to be made by any other person of the  
21                   Protected Information in this case;
- 22           b.       allow any other person to read, listen, or otherwise review the Protected  
23                   Information in this case;
- 24           c.       use the Protected Information for any purpose other than preparing to defend

1 against or prosecute the charges in the Indictment or any further superseding  
2 indictment arising out of this case; or

3 d. attach any Protected Information to any of the pleadings, briefs, or other court  
4 filings except to the extent those pleadings, briefs, or filings are filed under seal or  
5 properly compliant with LR IC 6-1.

6 6. The Protected Information shall be segregated from discovery not containing  
7 taxpayer or personal identifying information, and defendant shall only be permitted to review the  
8 Protected Information in the presence of defense counsel who shall retain exclusive possession  
9 of the Protected Information. Defense counsel will ensure that any discovery item left with  
10 defendant is fully redacted of any Protected Information.

11 7. Nothing in this stipulation is intended to restrict the parties' use or introduction of  
12 the Protected Information as evidence at trial or support in motion practice.

13 8. The parties shall inform any person to whom disclosure may be made pursuant to  
14 this order of the existence and terms of this Court's order.

15 9. The parties reserve the right to seek to modify the terms of this protective order at  
16 a later time pursuant to Federal Rule of Criminal Procedure 16(d)(1). Should a reasonable need  
17 for this protective order cease to exist, on grounds other than a Covered Individual or some other  
18 person violating or circumventing its terms, the government will move expeditiously for its  
19 dissolution.

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10. The defense hereby stipulates to this protective order.

DATED: July 7, 2020

Respectfully submitted,

For the United States:

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United States Attorney  
PETER S. LEVITT  
Assistant United States Attorney

/s/ Valerie G. Preiss  
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For the Defense:

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**IT IS SO ORDERED:**

  
ELAYNA J. YOUCHAH  
United States Magistrate Judge

July 8, 2020

Date